

Exhibit A

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
VELMA CRAIG,

Plaintiff,

INDEX NO.:
04 CIV 4857

- against -

CITY OF NEW YORK; POLICE
DEPARTMENT SCHOOL SAFETY
DIVISION,

Defendants.
-----X

Corporation Counsel
100 Church Street
New York, New York

September 13, 2005
11:00 A.M.

EXAMINATION BEFORE TRIAL of VELMA

CRAIG, the Plaintiff herein, taken by the attorney
for the Defendants, pursuant to Order, and held
before Ronald M. Glick, a Notary Public of the
State of New York at the above-stated time and
place.

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APPEARANCES:

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VELMA CRAIG

Appearing Pro Se

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7

MICHAEL A. CARDOZO, ESQ.

8

Corporation Counsel

Attorney for the Defendants

9

100 Church Street, 4th Floor

New York, New York 10008

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BY: ISAAC KLEPFISH, ESQ.

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FILE No. 04-LE-000-358

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Five Star Reporting, Inc.

***** Suites in all Boroughs *****

(631) 224-5054

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FEDERAL STIPULATIONS

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IT IS HEREBY STIPULATED AND AGREED,
by and between the parties hereto, through
their respective Counsel, that the certifi-
cation, sealing and filing of the within
examination will be and the same are hereby
waived;

IT IS FURTHER STIPULATED AND AGREED
that all objections, except as to the form
of the question, will be reserved to the
time of the trial;

IT IS FURTHER STIPULATED AND AGREED
that the within examination may be signed
before any Notary Public with the same
force and effect as if signed and sworn to
before this Court.

1 Velma Craig 46

2 Q What is that?

3 A Those who are lead by the spirit of God
4 once again are the sons of God.

5 Q That's your basis for saying you're not
6 allowed to take a fingerprint of your right hand?

7 A Well, because that was the situation at
8 hand.

9 No. I wouldn't say. I wouldn't word
10 it that way.

11 Q How --

12 A I would say I was not lead to get up
13 and go like everybody else and go to that van and
14 take the ride.

15 So yes, I believe the Holy Spirit
16 stopped me from going, yes.

17 Q Now, after the Holy Spirit in your
18 belief stopped you from going, after that, have
19 you found any basis in the Scriptures for your
20 belief that you should not or you're not allowed
21 to take a fingerprint of your right hand?

22 Other than that the Holy Spirit stopped
23 you, is there anything in the bible that says
24 you're not allowed to take a fingerprint of your
25 right hand?

Velma Craig

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1

2 A (No response.)

3 Q Are you familiar with any?

4 A Well, the suspicion arose because of
5 Revelation 13. It still goes back to Roman's
6 8:14.

7 Q Which says what?

8 A Those that are lead by the Spirit.

9 I mean, it's just -- the bible, like

10 for instance, less take a club for instance.

11 Okay?

12 THE REPORTER: Counselor, can I say

13 something?

14 MR. KLEPFISH: Yes.

15 THE REPORTER: Thank you. Let's go

16 off the record.

17 (Whereupon, there was a discussion

18 held off the record.)

19 Q In the bible it says, for example, one

20 is not allowed to kill; and you can point to a

21 passage in the bible that says that.

22 Is there any passage in the bible you

23 can point to that says you cannot take a

24 fingerprint of your right hand?

25 A Yes.

1

Velma Craig

48

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Q Where is that?

3

A Revelation 13.

4

Q Where does say that?

5

A It's talking about the mark of the

6

beast, and those that will worship the mark of the

7

beast will take that mark.

8

Of course, it's instructing us that our

9

believers, that we are not to take it.

10

Q You're saying the fingerprint is a mark

11

of the beast?

12

A I'm not saying that.

13

Q Then --

14

A I am saying -- what I am saying is

15

that's what -- you asked me the question.

16

Q Right.

17

A Right. Is there anywhere in the bible

18

that says anything about taking the right hand

19

imprint?

20

Q Yes.

21

A And yes, there is, in Revelation 13.

22

I'm not saying the I.D. I'm not saying

23

that. I am saying I shouldn't have the device

24

because of the possible significance, spiritual

25

significance.

1

Velma Craig

49

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Now, is it or is it not? I don't know.

3

Q Again, in Revelations does it say you

4

can't take the fingerprint of your right hand?

5

Just answer the question.

6

A I just answered the question, sir.

7

Q It's yes or no.

8

Does it say it or not?

9

A It says those that take it worship the

10

mark of the beast.

11

Q I'm trying to understand this.

12

You're not supposed to worship the mark

13

of the beast?

14

A Well, taking the mark of the beast is

15

worshipping the mark of the beast.

16

Q -- You're saying if you take the

17

fingerprint of your right hand it's like

18

worshipping the beast?

19

A No. What I'm saying -- well, yes, with

20

Revelation 13.

21

But what I'm saying, I still have to go

22

back to Roman's 8:14.

23

Q Which says?

24

A Which says those who are lead by the

25

Spirit, --

1 Velma Craig 50

2 Q Okay.

3 A -- those are the true sons of God.

4 Q Do you know if --

5 A I have to go by that.

6 Q Are you part of any Christian
7 denomination?

8 Are you just called Christian?

9 A I am a Christian.

10 Q Do all Christians believe you're not
11 allowed to take the fingerprint of their right
12 hand?

13 A No.

14 Q Some Christians do take the fingerprint
15 of their right hand?

16 A Well, because we're not even sure if
17 the mark of the beast is here yet. Okay. So some
18 people take different positions. It depends on
19 how the Spirit leads.

20 Q Okay. So you're saying to me that the
21 reason why you don't want to take the fingerprint
22 of your right hand is because you believe the
23 Spirit is telling you not to?

24 A I believe that's the leading of the
25 Holy Spirit.

1 Velma Craig 51

2 Q You believe the Spirit has moved you in
3 this direction not to take the fingerprint?

4 A Exactly.

5 Q And you believe the spirit appeared to
6 you in the sense that you didn't have this
7 reaction to go to Manhattan, and that was the
8 Spirit basically telling you not to go?

9 A Yes.

10 Q Now, at any point -- you said the next
11 day after you didn't go to Manhattan. This is the
12 next day, now.

13 Somebody named Sondra told you about a
14 chip in the card and she complained?

15 A She blurted it out to everybody. She
16 screamed it out. She was very upset.

17 Q And is the chip a problem?

18 Does the chip represent a problem to
19 you in your religion?

20 A Does the chip? No. It's just back to
21 Roman's 8:14.

22 Q The Spirit is telling you not to get
23 this card because of the chip in it?

24 A No, I can't say that. The Spirit has
25 lead me not to accept this card, period.

1 Velma Craig 52

2 Q Do you know why the Spirit is directing
3 you in this path?

4 A I really believe that the Lord is
5 interested in the end-time harvest.

6 Q What?

7 A End-time harvest.

8 Souls to come into the Kingdom of God.

9 Q Okay.

10 A That's what I believe.

11 Q Okay.

12 A Now, I'm not asking anyone to follow my
13 belief or follow the Christianity, but that's what
14 I believe.

15 Q What does it mean, end-time harvest of
16 souls?

17 A It means for people to come to know the
18 Lord Jesus Christ as the messiah --

19 Q Okay.

20 A -- and as the savior of the world.

21 Q Have you ever asked a religious
22 Christian cleric or priest, I guess, whether what
23 you're doing is correct or not?

24 A Sure.

25 Q Who did you ask?

1 Velma Craig 60

2 A Sorry about that.

3 Q Okay.

4 A But --

5 Q Did there come a time when you were
6 suspended?

7 A Right.

8 Q Do you know why?

9 A I was suspended because that was that
10 whole scenario I had told Mr. Grant about the I.D.
11 and I wouldn't be able to accept it.

12 And Mr. -- Mr. Graves, he told me Mr.
13 Grant would speak to me about it when he returned.
14 And when he returned he did ask me about the I.D.
15 But then that was the whole scenario behind this
16 suspension where they removed the other officer
17 and then put her in another school with ten plus
18 officers and left me there alone.

19 Q Miss Craig, you're going on and on.
20 This has nothing to do with the question.

21 MR. KLEPFISH: I move to strike it.

22 Q Okay. Were you at some point served
23 with charges at the time you were suspended?

24 A Yes.

25 Q Do you know what the charges were?

1 Velma Craig 61

2 A I was offered the I.D. I was offered
3 the I.D. card and I told them I could not accept
4 it.

5 Q Okay. And did you say the reason why?

6 A Yes.

7 Q What reason did you tell them?

8 A I believe I told him that I just cannot
9 accept it. I'm lead by the Lord not to accept it
10 because of my spiritual convictions.

11 Q Okay. Now, do you know why the
12 police --

13 MR. KLEPFISH: Strike that.

14 Q Do you know why School Safety was
15 changing the card that you had originally?

16 A Yes. I believe it had something to do
17 with terrorists.

18 Q They wanted a more secure card in its
19 attempt to fight terrorism; would you say that is
20 true?

21 A That's possible, yes.

22 Q Okay. For security purposes this card
23 with the fingerprint was much more secure to
24 prevent security breaches; is that true?

25 A Well, they -- it's possible it was

1 Velma Craig 62

2 described that way to me.

3 Q Okay. And nonetheless, you still felt
4 you shouldn't have this card; is that correct?

5 A Well, that's because of Roman's 8:14
6 again.

7 Q I got you.

8 Now, was there a period of time where
9 the School Safety administration tried to convince
10 you to take the card?

11 A That was on December 23rd, 2003, the
12 day I was suspended.

13 Q And they tried to convince you to take
14 the card.

15 You refused and you were suspended?

16 A Yes.

17 Q And there were charges brought against
18 you?

19 A Yes.

20 Q Were you also directed to go to
21 psychological services for evaluation on that day?

22 A That was their suggestion.

23 Q And you refused to go?

24 A Of course.

25 Q Why?

1 Velma Craig 95

2 A December 23rd, 2004? That's -- I was
3 suspended December 23rd, 2003.

4 Q Well, this must be a mistake here in
5 the paper.

6 On December 23rd, 2003; would you
7 consider that suspension discriminatory?

8 A Yes.

9 Q Why?

10 A Well, because it was based on what I
11 believe.

12 Q You also say that you believe that you
13 were discriminated on February 9th, 2004.

14 Do you know what discriminatory act
15 took place on that date?

16 A That was the date, I believe, that I
17 went back -- that I was reinstated.

18 Well, as a result of the suspension I
19 was, No. 1, asked not to wear a uniform. I was
20 not -- therefore, I was not going to be placed in
21 a school which was my desired profession which was
22 to work with children. I was stripped of that.

23 I was working in a office doing this,
24 which is what this paper is and --

25 MR. KLEPFISH: Let's mark this.

1 Velma Craig 96

2 A -- that's not what I applied for.

3 MR. KLEPFISH: Let's mark this exhibit.

4 She referred to this.

5 A That is not what I applied for.

6 MR. KLEPFISH: Hold on. Hold on.

7 (Whereupon, a two-page document was
8 marked as Defendant's Exhibit B for
9 identification, as of this date.)

10 Q This is Exhibit B. You referred to
11 this and pointed to this in your testimony.

12 What is this?

13 A Yeah. I'm just saying that that is
14 what I was doing, what I was assigned to do.

15 Q Which is --

16 A Which was not what I applied for.

17 Q When you went back to work on February

18 9th, 2004 you did not have a new I.D. card?

19 A Right.

20 Q And you didn't have an old I.D. card,
21 either?

22 A Right.

23 Q Now, you also state in this Complaint
24 that you also were subjected to a discriminatory
25 act on March 1st, 2004.

1 Velma Craig 113

2 A Not working with children. I never
3 applied to -- if I wanted to be, you know -- to do
4 that I would have applied for something like that.

5 Q Okay.

6 A I applied to work with children. That
7 was what I wanted to do.

8 Q Okay. So the fact that you were not
9 working with children in your view was a form of
10 being -- of discrimination?

11 A Yes.

12 Q Okay.

13 A It was a form of a punishment, I
14 thought. I thought when I went back that I was
15 being punished.

16 Q You --

17 A That's how I felt, that I was just
18 being punished for what I did.

19 Q You thought a reinstatement from
20 suspension is punishment?

21 A The way I was treated after
22 reinstatement.

23 Q Were you getting the same salary as
24 before you were when you were reinstated?

25 Once you got the paychecks back in

1 Velma Craig 116

2 A I'm not sure.

3 Q So you're saying --

4 A What I'm saying, I was offered the I.D.
5 again after six weeks' suspension.

6 Q Okay.

7 A So I, of course, denied it again and
8 then I was told to come back. And that was the
9 seventh week.

10 Q So you were given the option of being
11 reinstated in uniform back at a school with the
12 new I.D. card, and you refused that?

13 A Yes.

14 Q And you were reinstated at 110
15 Livingston and worked in the office there?

16 A Yes.

17 Q Okay. And as far as -- you don't

18 know -- is this true, that you don't know whether
19 the union owes you money or not?

20 You just think they do because Miss
21 Cannon told you something?

22 A I think that's possible.

23 Q What do you mean?

24 What I'm saying is not accurate?

25 A Right. I'm saying it's possible